

## Fowlow, Jeffrey

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**From:** Geigle, Roman <RGeigle@nrcc.com>  
**Sent:** Thursday, March 21, 2019 11:28 AM  
**To:** Fowlow, Jeffrey; ron.holcomb@ecy.wa.gov  
**Subject:** update Re: REVISION RE: Eco Labs phosphene reacting drums 401 E Alexander Tacoma.

UPDATE 2-21-19

All containers of material successfully transferred to DOT steel drums with out incident or further reaction. Waste material will be left on site pending profiling and disposal approval from EPA and WA DOE.

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Seattle Emergency Response Manager  
Cell 503.522.2473

\*\*Sent from mobile device, please excuse typos.

**Roman Geigle**  
ER Supervisor II

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On Mar 20, 2019, at 9:36 AM, Geigle, Roman <[RGeigle@nrcc.com](mailto:RGeigle@nrcc.com)> wrote:

REVISION to air monitoring criteria  
EPA and WA DOE will be made if at any time fire or smoke are witnessed from reacting drums or air monitoring outside of court yard indicates the sustained presence of greater than 0.30 ppm phosphene gas for **greater than 5 minutes** or air monitoring inside the court yard indicates sustained presence of greater than **0.5 ppm** phosphene gas.

**Roman Geigle**  
ER Supervisor II

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**From:** Geigle, Roman <[RGeigle@nrcc.com](mailto:RGeigle@nrcc.com)>

**Sent:** Wednesday, March 20, 2019 7:27 AM

**To:** [fowlow.jeffrey@epa.gov](mailto:fowlow.jeffrey@epa.gov); [ron.holcomb@ecy.wa.gov](mailto:ron.holcomb@ecy.wa.gov)

**Subject:** Eco Labs phosphene reacting drums 401 E Alexander Tacoma.

Situation and scope of work for phosphene reacting drums

Key actions

NRC with the support of Eco Labs will isolate and control entry to Eco Labs gates facility and proximity to subject reacting drums in facility court yard. Facility front gate will be closed and locked. Do not cross tape will remain in place around facility as visual indicator or buffer space to isolated area.

NRC will maintain one technician on site to work along side Eco Labs representatives to conduct continues area air monitoring every 30 minutes and logged at points identified by EPA and WA DOE inside and outside facility court yard.

At 2300 on 3-20-19 NRC and Eco Labs representatives will enter isolation area and attempt to agitate the contents of the reacting drums to verify material reaction is complete and material is stable. EPA and WA DOE will be notified prior to agitation . If material is still reacting the drums will be left for an additional 24 hours area monitoring will resume. After 24 hours the process of verifying drum reaction will resume as previously described.

In the event of rain temporary structures or tents will be placed over reacting drums to prevent moisture from coming in contact with material.

Emergency notifications to Local fire department, EPA and WA DOE will be made if at any time fire or smoke are witnessed from reacting drums or air monitoring out side of court yard indicates the sustained presence of greater that 0.30 ppm phosphene gas or air monitoring inside the court yard indicates sustained presence of greater than 1.0 ppm phosphene gas.

Prior to material being moved off site for disposal EPA will be notified of disposal plan and disposal facility for approval .

**Roman Geigle**

ER Supervisor II

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